



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Jacob K. Javits Federal Building
26 Federal Plaza, 37th Floor
New York, New York 10278*

September 3, 2024

BY ECF

The Honorable Mary Kay Vyskocil
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 9/3/2024

Re: United States v. Larry Ramos, 23 Cr. 554 (MKV)

Dear Judge Vyskocil:

On August 28, 2024, upon receipt of the report of the defendant's competency evaluation performed by the Bureau of Prisons ("BOP"), the Court directed the parties to submit a joint status letter setting forth their positions regarding the defendant's competency by September 4, 2024. (Dkt. 51). The parties conferred promptly after issuance of the Court's order and conferred again today. Defense counsel intends to speak with the defendant personally regarding the BOP's competency report and may also consult a medical expert. Defense counsel has arranged a call with the defendant, who is detained, at the earliest opportunity. That call is presently scheduled for tomorrow, September 4.

In order to ensure defense counsel has sufficient time to advise and consult the defendant, consult a medical expert if needed, and confer with the Government with the benefit of that information, the parties respectfully request the Court extend the time to submit a joint status update until next Friday, September 13.

Because the defendant's competency proceedings are not yet resolved, Speedy Trial time remains tolled pursuant to 18 U.S.C. § 3161(h)(1)(A) (excluding "delay resulting from any proceeding, including any examinations, to determine the mental competency or physical capacity of the defendant"). Nevertheless, out of an abundance of caution, the Government respectfully moves to exclude Speedy Trial time until September 13, 2024, pursuant to 18 U.S.C. § 3161(h)(7) (authorizing the Court to exclude time if "the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial"). Such an exclusion is in the


The Honorable Mary Kay Vyskocil
September 3, 2024

Page 2

interest of justice because it will allow the defense to formulate an informed position regarding the defendant's competency. The defense consents to this application.

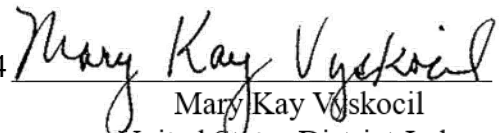
Respectfully submitted,

DAMIAN WILLIAMS

by: 
Alexander Li / Getzel Berger
Assistant United States Attorneys
(212) 637-2265 / -1061

Granted. SO ORDERED.

Date: September 3, 2024
New York, New York


Mary Kay Vyskocil
United States District Judge